



U.S. Department of the Interior
"To-Be" Trust Business Model
Process Template

Title: Investment Operations

Identify the process in the "Verb Noun" format. (Ex: Maintain Ownership)

Process Number
FO.2

1. Process Definition *Provide an overview of the process and define its starting and ending points*

1.1 Starts With	Funds are available in a beneficiary account.
1.2 Process Overview	<p>This process invests short-term and purchases and sells securities in accordance with tribal account holder investment strategies. It also provides investment performance information through the investment performance measurement system.</p> <p>For a detailed explanation, see the following:</p> <p>FO.2.1 Review Accounts and Investment Options</p> <p>FO.2.2 Pool and Sweep Funds for Short Term Investment</p> <p>FO.2.3 Execute Trades for Long Term Investment</p> <p>FO.2.4 Produce Report</p>
1.3 Stops With	An investment activity report.

2. Trust Business Objectives *Identify the Comprehensive Trust Model strategic goals and business objectives to which this process contributes.*

Goal/Objective
Manage and invest fund assets to provide prudent rates of return in accordance with appropriate statutes and investment strategy options while considering the best interests of the beneficiaries.

3. How should Beneficiaries be involved in this process?

Beneficiary Involvement
A tribal beneficiary meets with trust personnel to choose an investment strategy. IIM accountholders chose to leave their money in the account for short term investment by the government.

4. Organizations, Offices and Roles. *Identify the DOI organizations and related roles that should be involved in performing the process.*

4.1 DOI Organizations. *Identify the DOI organizations, offices and individual roles that contribute to this process.*

DOI organizations include the Office of the Secretary, BIA, OST, BLM, MMS, OHA, OSM among others. Offices include Central Offices, Regional Offices, Agency (Field) Offices, etc. All individual roles that contribute, in a significant manner, should be identified.

Organization	Office	Role	Contribution
OST	Trust Services		Explain available investment options



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Organization	Office	Role	Contribution
			to a tribal beneficiary. Review investment strategies selected by a beneficiary. Review beneficiary account cash management detail. Determine funds available for short or long term investment. Pool funds for short term investment. Invest money with Treasury. Calculate monthly interest earnings used in the IIM interest factor. Determine purchases and sales. Place orders to purchase or redeem securities. Verify income payable for the day and reconcile differences from the previous day. Monitor security buys/sells, calls/maturities. Verify and reconcile custodian transactions. Reconcile, research and correct out-of-balance securities. Provide periodic review and quality control of investment operations.
	Investment Committee		Monitor investor-related input factors. Monitor market conditions. Develop investment portfolios.



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4.2 Non-DOI Organizations. *Identify the non-DOI organizations that support the execution or control of this process.*

External Organization	Contribution
Custodian	Hold all tribal securities for safekeeping. Provide the following for tribal investments: <ul style="list-style-type: none">• Investment information services• Income accrual• Amortization• Accretion (opposite of amortization)
Treasury	Invest trust funds in overnighter and provide interest earnings. Serve as the government bank.
Brokers	Execute trades. Report investment activity.

5. Event(s) *Identify the events or conditions that start the process. Describe each event and indicate the frequency (daily, monthly, quarterly, etc.) in which each event is expected to occur. An event may be an external interaction (a beneficiary submits an application), the expiration of a period of time (a lease is due to expire in 90 days), or the realization of some pre-defined threshold (an IIM account reaches the automatic disbursement threshold).*

Event	Description	Estimated Frequency
Receipt of funds	Monies received in a beneficiary's account that are available for short or long-term investment.	Daily
Receive an ad-hoc request for an investment transaction	Special instructions from authorized personnel.	Infrequently
Need to disburse funds	Sale of securities is required to raise funds to meet disbursement needs.	Infrequently
An investment transaction occurs	Security purchases and redemptions.	Daily



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6. Inputs and Outputs. *Identify and describe all inputs and outputs related to this process. Inputs are information or materials used during the execution of the process; outputs are materials or information produced by the process.*

6.1 Inputs

Input	Description
Beneficiary account	An account created to receive and disburse trust-related monies to individual Indian and tribal beneficiaries.
Investment strategy options	Options that outline the manner in which a tribal beneficiary wants its money invested
Disbursement request	The sale of securities required to provide the necessary funds to meet a disbursement request.
A decision to invest short-term	Based on the beneficiary's account balance and a tribe's choice of an investment option.
A decision to invest long term	Based on the tribal beneficiary's account balance and choice of an investment option.
Treasury transmittal	Authorization to pay for a security.
Trade advice	Verification of trade execution from a broker.
Custodian's report	A report providing the following for tribal investments: <ul style="list-style-type: none">• Investment information services• Income accrual• Amortization• Accretion (opposite of amortization)

6.2 Outputs

Output	Description
Updated pool balance	Pool balance reflecting results of short-term investment activity.
Updated beneficiary accounts	Accounts are updated with investment earnings.
Investment Activity Report	A system-generated report of investment transactions.
Security Advice of Credit for Payments	Treasury confirms payment of principal and/or interest on stated security



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Output	Description
Treasury Form SF-215, Deposit ticket	Treasury confirms date, amount, account of deposit, name of depository, depositor's title and address
Treasury Form 5515, Debit Voucher	Treasury confirms date, amount, account of debit, name of depository, depositor's title and address
Notification of P&I Credit	Treasury generates when interest and maturities are paid to securities. Confirms payment of principal and/or interest on state security.

7. Fiduciary and Legal Obligations and Controls

7.1 Obligations

Identify and describe the legal and fiduciary obligations that impact this process. For each obligation, indicate the document or commitment that defines the obligation and the citation (paragraph or section) within the document that pertains to this process.

Obligation	Source	Business Impact
Regulations on deposit, care, and investment of Indian monies	25 USC (United States Code) 161,162	Prescribes allowable trust investments for trust funds held by the U.S. Government.
Regulations on unclaimed per capita accounts	Public law 87-283	Manage and invest trust fund assets to provide prudent rates of return.
Mandated requirements for trust assets management	Trust Reform Act (Public Law 103-412)	Accountability for trust funds.
Regulations for carrying out the duties to manage and administer trust assets	25 CFR 115	Guidelines for management of trust funds for tribes and individual Indians. Subpart F 702 –800: Types of funds that can be received into trust; tribal accounts, withdrawals, investments, liquidations.
Guidance on cash and investment transactions	Treasury regulations	Safeguard trust assets.



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Obligation	Source	Business Impact
Freedom of Information Act (FOIA)	5 USC 552	Provides specifically that "any person" can make requests for government information. Citizens who make requests are not required to identify themselves or explain why they want the information they have requested. All branches of the Federal government must adhere to the provisions of FOIA with certain restrictions for work in progress (early drafts), enforcement confidential information, classified documents, and national security information.
Privacy Act of 1974	5 USC 552 (a)	Protects information pertaining to individuals.

7.2 Controls

Identify and describe any controls (enforcement mechanisms) that may be used to ensure that the process adheres to obligations and internal process requirements. Controls may be reviews, audits, segregated duties, etc. Indicate the reason that each control should be introduced (name the obligation that a control is intended to enforce; indicate any controls required to ensure consistency or reliability).

Control	Reason	Description
Department Order No.3215	Ensure consistency in the administration of trust responsibility.	Principles for the discharge of the Secretary's trust responsibility.
OTFM Manual Part 220.4	Ensure compliance with financial standards.	Policies, procedures and operations manuals pertaining to the management of the Indian trust fund.
Interagency Handbook	Ensure that the distinctions between the BIA and OST responsibilities are defined, understood and followed.	Define roles and responsibilities of OST and BIA.
Audits	Ensure adherence to policies and procedures and that an audit trail is intact.	Analysis, adjustment of accounts. May include a certification of accuracy from a non-prejudiced accounting professional.
Reconciliation	Ensure that accounts are in balance.	Perform daily reconciliation, including reconciliation with Treasury on investment account activity and balances.



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Control	Reason	Description
An internal audit control function is in place following OCC requirements to monitor processes	DOI consults with OCC to develop trust standards and regulations to ensure compliance with stated objectives.	Office of Controller of the Currency (OCC) - Regulation 9. Government financial standards.
Segregation of duties	Ensure that the risks associated with performing investment activities on behalf of beneficiaries is mitigated as much as possible.	Segregate roles and responsibilities for functions such as trading, calculation of interest earned and reconciliation.
Peer review, sampling, management control review and quality assurance	Ensure consistent adherence to financial procedures and accuracy of accounting entries.	Internal audits and checks.

8. Mechanisms (Systems of Record) *Identify the mechanisms, or systems, that are needed to support the process (ex: Ownership, Leasing, Workflow Management, Office Filing System, etc.). Indicate the information and activities, relevant to this process, that each system supports.*

System Name	Support
Trust Financial Accounting System (TFAS)	Technology that applies receipts, distributions and disbursements to the appropriate beneficiary and escrow accounts. An escrow tracking module is also included.
Investment portfolio management system	Technology system that includes: 1. Investment research (e.g., Bloomberg, pricing service, Landmark, Rightfax) 2. Investment performance 3. Portfolio modeling
Funds receivable system	Technology that tracks payor commitments of funds, such as leases, judgment awards, sales, probate settlements, and receipts against those commitments. A cash management module that allocates projected and actual receipts to and from beneficiary accounts is also included.
Funds payable system	Technology system that records scheduled and actual disbursements from trust and trust-related accounts to beneficiaries or third parties. A cash management module that allocates projected and actual disbursements to and from beneficiary accounts is also included.



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System Name	Support
Invest One Accounting System	Treasury system that contains account information, activity, balances and interest earnings. This is Treasury's system of record for the summary level investment of trust funds.
Interest earnings calculator	Technology that calculates the monthly interest earnings used in the IIM interest factor.

9. Inter-Process Relationships *Identify other Trust processes that are related to this process (either predecessors or successors). If applicable, indicate the condition under which the processes are related.*

9.1 Predecessors. *Predecessors are processes that either produce information required by this process or that result in the need to execute this process.*

Process No.	Name	Condition of Relationship
B.6.1	Provide Counsel on Asset Options	Provide information about tribal beneficiary investment option selected.
FO.1.1a	Create Trust Funds Receivable	Projected receipts are available for cash management review.
FO.1.1b	Create Non-Trust Funds Receivable	Projected receipts are available for cash management review.
FO.1.2a	Receive and Post Trust Funds	Receipts have been posted to the appropriate accounts and are available for review and investment.
FO.1.2b	Receive and Post Non-Trust Funds	Receipts have been posted to the appropriate accounts and are available for review and investment.
FO.3.1	Create Funds Payable	Projected disbursements are available for cash management review.
FO.3.3	Reconcile Pre-Disbursement Exceptions	If beneficiary account is not sufficient or is unavailable to cover a scheduled disbursement, an investment may be sold to provide the necessary funds.
FO.3.5	Post Disbursements	Actual disbursements are available for cash management review.



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9.2 Successors. *Successors are processes that either use information produced by this process or that must be executed as a result of performing this process.*

Process No.	Name	Condition of Relationship
FO.1.2a	Receive and Post Trust Funds	Receipts from investment transactions are credited to the appropriate accounts.
FO.1.2b	Receive and Post Non-Trust Funds	Receipts from investment transactions are credited to the appropriate accounts.
FO.4	Omnibus Reconciliation	Investment activity is available for reconciliation with associated accounts.
FO.5	Reporting and Statements	Investment activity and position information is available for inclusion in beneficiary statements.
B.6.1	Provide Counsel on Asset Options	Review investment performance and activity with beneficiaries.

10. Comments *Summarize any discussion, problems, issues or recommendations that should be considered when reviewing process performance. Category Values (Note, Best Practice, Decision, Problem, Issue, Recommendation)*

Category	Comment
Issue	Who serves on the investment committee?